



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

MAY 19 1992

Ref: 8HWM-FF

Mr. Frazer Lockhart
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

RE: Annual Report for
Treatability Studies at
Rocky Flats Plant FY 91

Dear Mr. Lockhart,

Overall, this annual report included all the information required in Section 3.3 of the Final Site-Wide Treatability Study Plan (TSP) and in EPA's approval letter of the TSP, dated October 22, 1991. However, it appears that a lack of coordination among the TSP, the OU-Specific Feasibility Studies, the IM/IRAs pilot/field scale testing and other research programs still remains. In addition, the report failed to include a schedule detailing the implementation of all the selected treatability studies and information pertaining to some of DOE's responses to EPA's previous comments.

The TSP was developed to provide an overall framework for coordinating all the treatability studies being performed under other programs and to select and develop other technologies with potential application to Rocky Flats Plant (RFP) contamination problems. In this manner, duplication of studies will be prevented and the technologies developed under the TSP and other research programs could be used in the OU-Specific Feasibility Studies. This function of the TSP in the overall remedial program at RFP needs to be explained in detail.

The fact that EPA agreed to DOE submitting annual update reports to document the status of TSP implementation, does not "supercede" IAG requirements or relieve DOE of the responsibility to perform the treatability studies in a timely manner. EPA wants to bring to DOE's attention that the final TSP was approved with the understanding that DOE will have performed a minimum of five studies for ground water and surface water contamination and eight studies for soil and sediments contamination prior to the second annual report due date. To date, DOE has submitted only three treatability study work plans, and has not begun conducting any of the selected treatability studies. EPA is concerned that DOE will be unable to perform all the studies in the time available. DOE needs to submit a schedule showing (13) milestone

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dates for the start and completion of all planned treatability studies. In so doing, EPA suggests DOE examine the resources available and prioritize the studies, determining which ones are to be pursued and completed during FY 92.

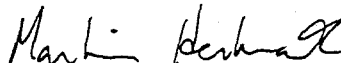
According to the Final Comment/Resolution Summary dated March 1992, the annual report should have included a complete discussion on the relationship between the management decision factors and the technology selection processes, and the specific advantages of the selected technologies over other similar technologies. In reviewing the annual report we were unable to find this information. We feel that this information is crucial to understanding how everything fits together in order to evaluate whether the selection of technologies was appropriate. In particular, we want to know the importance of the management decision factors in the overall selection process.

In order to resolve the above concerns, DOE must submit additional information to EPA. This must include the following: 1) an explanation of the TSP function in the overall remedial program at RFP; 2) a detailed implementation schedule of the treatability studies and a milestone schedule; 3) an explanation of the management decision factors role in the technology selection process and 4) a list of the advantages of the selected technologies over other similar technologies. Please submit this information by June 10, 1992.

Attached, please find EPA's contractor comments which provide more specific documentation of the basis for these concerns, and raise several additional issues for your consideration in preparing the next annual report.

Please, do not hesitate to contact Arturo Duran of my staff at (303) 294-1080 with any questions or comments you may have.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

Enclosure

cc: Scott Grace, DOE
Tom Greengard, EG&G
Olga Erlich, EG&G
Gary Baughman, CDH
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